

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TRAVELERS CASUALTY AND SURETY  
COMPANY as Administrator for RELIANCE  
INSURANCE COMPANY,

Civil Action No. 07-CV-6915 (DLC)

Plaintiff,

vs

THE DORMITORY AUTHORITY OF THE STATE  
OF NEW YORK, TDX CONSTRUCTION CORP. and  
KOHN, PEDERSON, FOX & ASSOCIATES, P.C.,

**FEDERAL CIVIL RULE  
7.1 DISCLOSURE STATEMENT**

Defendants.

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DORMITORY AUTHORITY OF THE STATE OF  
NEW YORK,

Third-Party Plaintiff,

vs

TRATAROS CONSTRUCTION, INC. and TRAVELERS  
CASUALTY AND SURETY COMPANY,

Third-Party Defendants.

-----X  
TRATAROS CONSTRUCTION, INC. and TRAVELERS  
CASUALTY AND SURETY COMPANY,

Fourth-Party Plaintiffs,

vs

G.M. CROCKETT, INC., CAROLINA CASUALTY  
INSURANCE COMPANY, BARTEC INDUSTRIES,  
INC., DAYTON SUPERIOR SPECIALTY CHEMICAL  
CORP., SPECIALTY CONSTRUCTION BRANDS,  
INC. t/a TEC, KEMPER CASUALTY INSURANCE  
COMPANY d/b/a KEMPER INSURANCE COMPANY,  
GREAT AMERICAN INSURANCE COMPANY,  
NATIONAL UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA., UNITED STATES FIRE  
INSURANCE COMPANY, ALLIED WORLD  
ASSURANCE COMPANY (U.S.) INC. f/k/a/  
COMMERCIAL UNDERWRITERS INSURANCE  
COMPANY, ZURICH AMERICAN INSURANCE  
COMPANY d/b/a ZURICH INSURANCE COMPANY,  
OHIO CASUALTY INSURANCE COMPANY d/b/a  
OHIO CASUALTY GROUP, HARLEYSVILLE  
MUTUAL INSURANCE COMPANY (a/k/a  
HARLEYSVILLE INSURANCE COMPANY, an insurer  
for BARTEC INDUSTRIES INC.), JOHN DOES 1-20  
and XYZ CORPS. 1-12,

Fourth-Party Defendants.

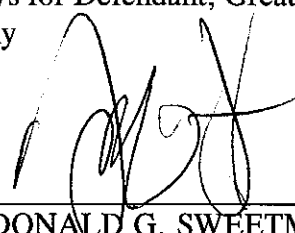
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Pursuant to Federal Rule of Civil Procedure 7.1, and to enable judges and magistrate judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Great American Insurance Company of New York (a private non-governmental party) and American National Fire Insurance Company, (a private non-governmental party) certifies that Great American Insurance Company of New York acquired American National Fire Insurance Company on or about November 2000. The following are corporate parents, affiliates and/or subsidiaries of said parties which are publicly held: See attached.

Dated: Parsippany, New Jersey  
April 24, 2008

GENNET, KALLMANN, ANTIN & ROBINSON  
Attorneys for Defendant, Great American Insurance  
Company

By

  
\_\_\_\_\_  
DONALD G. SWEETMAN

Our File No. 05-6698:35.0053-S

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DATE: Reissued April 29, 2003

RE: THE AFG FAMILY- WHO ARE THE RELATIVES?

**THE AFG FAMILY- WHO ARE THE RELATIVES?**

In the course of managing litigation you may receive an inquiry that arises from the local rules of the federal courts which requires the disclosure of any publicly traded parent or, in some instances, subsidiaries or affiliates of a party to the lawsuit. This disclosure allows the court to be aware of any potential conflicts of interest; if, for example, the judge discovers that he owns stock in the defendant's publicly traded parent company. This overview follows to assist you in providing corporate information.

**AMERICAN FINANCIAL GROUP, INC. ("AFG")**

American Financial Group, Inc. ("AFG") is a publicly traded, diversified holding company and is the **ULTIMATE PARENT** for our insurance companies. The stock of American Financial Group, Inc. is **PUBLICLY TRADED** on the New York Stock Exchange under the symbol AFG. **AFC Holding Company ("AFC")** is a subsidiary of AFG and is a diversified financial holding company wholly owned by its **PARENT, AFG**. **AFG and AFC are NOT insurance companies.**

AFG has an extended group of relatives. The extended family includes three "branches" or insurance holding company groups:

**1. GREAT AMERICAN INSURANCE COMPANY ("GAI")**

Abbreviated GAI

Organizational Chart:

American Financial Group, Inc. ("ULTIMATE PARENT")  
 \_\_\_\_\_ AFC Holding Company  
 \_\_\_\_\_ American Financial Corporation  
 \_\_\_\_\_ Great American Insurance Company

Great American Insurance Company ("GAI") is wholly owned by its immediate **PARENT**, American Financial Corporation, which is ultimately wholly owned by the **ULTIMATE PARENT, AFG**.

GAI is a 100% owner of many insurance **SUBSIDIARIES**, including for example, Great American Alliance Insurance Company, Great American Assurance Company, Great American Insurance Company of New York to name a few and is the "headline" company in the first branch.

**2. AMERICAN PREMIER UNDERWRITERS, INC. ("APU")  
INFINITY PROPERTY AND CASUALTY CORPORATION ("IPCC")**

Abbreviated APU &amp; IPCC

Organizational Chart:

American Financial Group, Inc. ("ULTIMATE PARENT")  
 \_\_\_\_\_ AFC Holding Company  
 \_\_\_\_\_ American Financial Corporation  
 \_\_\_\_\_ American Premier Underwriters, Inc.  
 \_\_\_\_\_ Infinity Property and Casualty Corporation

American Premier Underwriters, Inc. ("APU") represents the second family branch and is a diversified company wholly owned by American Financial Corporation, which is wholly owned by **AFC**, which is wholly owned by **AFG** (the same ultimate parentage as Great American Insurance Company).

Recently, by an initial public offering ("IPO"), an APU "heir" was created, Infinity Property and Casualty Corporation ("IPCC"). IPCC is **PUBLICLY TRADED** on NASDAQ. IPCC is **NOT** an

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insurance company. IPCC is the new PARENT of Atlanta Casualty Company, Infinity Insurance Company, Leader Insurance Company and Windsor Insurance Company, to name a few. Great American Insurance Company's Personal Automobile operations are also now a part of IPCC. IPCC's ULTIMATE PARENT, AFG, currently retains an approximate 40% interest in IPCC.

APU, IPCC and their subsidiaries are NOT owned by GAI. APU, IPCC and their subsidiaries are AFFILIATES of GAI and they share the same ULTIMATE PARENT, AFG.

### 3. GREAT AMERICAN FINANCIAL RESOURCES, INC. ("GAFRI")

Abbreviated GAFRI

Organizational Chart:

American Financial Group, Inc. ("ULTIMATE PARENT")

\_\_\_\_ AFC Holding Company

\_\_\_\_ American Financial Corporation

\_\_\_\_ Great American Financial Resources, Inc.

Great American Financial Resources, Inc. ("GAFRI") represents the third branch of the AFG family. It also shares AFG as its ULTIMATE PARENT. Its SUBSIDIARIES, for example, Great American Life Assurance Company, offer annuities, life, supplemental health and long-term care products unique from its property/casualty AFFILIATES, GAI, APU and IPCC. GAFRI, like its ULTIMATE PARENT, AFG, is traded on the New York Stock Exchange under the symbol GFR.

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After reviewing this article, you should be able to answer the following questions correctly:

Q1. Who is the publicly traded ULTIMATE PARENT of Great American Insurance Company?

A1. AMERICAN FINANCIAL GROUP, INC. (AFG is also the ULTIMATE PARENT of American Premier Underwriters, Inc., Infinity Property and Casualty Corporation and the annuity and life companies of Great American Financial Resources, Inc.)

Q2. True or False: Great American Insurance Company owns Atlanta Casualty Company.

A2. FALSE. Atlanta Casualty is now wholly owned by Infinity Property and Casualty Corporation and is part of a separate insurance holding company group. It is more accurately described as an "affiliate" of Great American Insurance Company and its operations are completely separate.

Q3. How many "branches" of insurers does American Financial Group, Inc. own?

A3. THREE: Great American Insurance Company, Infinity Property and Casualty Corporation and Great American Financial Resources, Inc. While American Premier Underwriters, Inc. is the corporate parent of Infinity Property and Casualty Corporation, the corporate entities that best represent the businesses of AFG are Great American Insurance Company, Infinity Property and Casualty Corporation and Great American Financial Resources, Inc.

If you need to determine the organizational location of any company with AFG, consult the current AFG Organizational Chart which is posted on the Corporate Legal Website (<https://www.aboutgreatamerican.com/legal>). In addition, the AFG Corporate Organizational chart can found in the "Annual Statement, Schedule Y" (Yellow Book) of any insurance company with the group.

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Please direct any questions about the corporate organization to the attention of:

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